

## Mobil Business Resources Corporation

3000 PEGASUS PARK DRIVE  
DALLAS, TEXAS 75247

P. O. BOX 850232  
DALLAS, TEXAS 75265-0232

OFFICE OF LEGAL COUNSEL

DEBORAH BAHN HAGLUND  
COUNSEL-MEPUS

TEL: (214) 851-3349  
FAX: (214) 851-2029

### VIA TELECOPY

September 22, 1997

David S. Guzy  
Chief, Rules and Procedures Staff  
Minerals Management Service  
Royalty Management Service  
Royalty Management Program  
P.O. Box 25165  
MS 3101  
Denver, Co. 80225-0165

**Mobil Business Resources Corporation Comments on MMS Notice, "Amendments to Gas Valuation Regulations for Federal Leases," 30 CFR 202, 206, and 211; 62 FR 19536 (April 22, 1997).**


Dear Mr. Guzy:

Mobil Business Resources Corporation, as agent for Mobil Exploration & Producing U.S. Inc. ("Mobil"), welcomes the opportunity to submit comments on MMS' April 22, 1997 Notice, 62 FR 19536, withdrawing its November 6, 1995 proposed rulemaking.

Mobil agrees with, and therefore incorporates herein by reference, the September 12, 1997 comments of the American Petroleum Institute ("API"), of which it is a member. Mobil, like the rest of API's members, is disappointed that MMS has withdrawn its November 6, 1995 proposal. That proposal was the result of a lengthy, labor intensive, collaborative effort in which many difficult issues were addressed and many compromises by all affected parties were made in order to achieve consensus. As the API comments document, the agency now has simply changed its mind, offering a rationale which is unfounded and requesting comments on "new" options that, in reality, are merely repackaged ideas that previously were explored and rejected by the Negotiated Rulemaking Committee.

Mobil strongly opposes the withdrawal of the November 6, 1995 proposed rule; it opposes the most recent options proposed by MMS; and it urges MMS to reconsider its decision to abandon the Negotiated Rulemaking Committee's consensus recommendation.

Very Truly Yours,



Deborah Bahn Haglund, Counsel  
Mobil Business Resources Corporation